



TELEDYNE
ELECTRONICS AND COMMUNICATIONS
Microelectronic Technologies - Dept. of EHS
A Teledyne Technologies Company

Environmental Management System (EMS)



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Environmental Management System (EMS)

I. Purpose and Scope

Teledyne Microelectronic Technologies Environmental Management System (EMS) is designed to instruct the business unit in ways to operate and maintain regulatory compliance with applicable federal, state and local environmental laws, regulations, permits and corporate policies. All key elements referenced in Teledyne Technologies Incorporated Environmental Management System Manual have been addressed in this document, either by means of written procedures or through corporate policies and procedures documented elsewhere.

II. Applicability

Teledyne Microelectronic Technologies Environmental Management System (EMS) applies to manufacturing operations or process that impact, or have the potential to impact, the environment.

III. Key Terms and Definitions

Key Terms and Definitions contained in Teledyne Microelectronic Technologies Environmental Management System (EMS) have the following meaning:

- **Change (Management of Change)** - is any action, modification, or substitution that is not a one for one replacement in kind. Changes which, should be covered are to include but are not limited to modifications to products, processes, equipment, stacks, drains, procedures, regulations, personnel, and the use of new raw materials.
- **Compliance Mechanism** – is any procedure, practice, equipment, or operation controlling an aspect of environmental compliance.
- **Environmental Emergency** – is any incident, accident, process upset (as that term is defined in the environmental regulations), or any other event that causes or has the potential of causing an unplanned release that represents a threat to human health or the environment and/or results in the violation of a permit condition or regulatory requirement.
- **Environmental Incident** – is anything that the Environmental Director or environmental staff member determines (with appropriate consultation with a Teledyne attorney) may not be in accordance with Teledyne Corporate policy, applicable procedures, federal, state, or local laws or regulations in the environmental arena. The characterization of an event as an Environmental Incident does not necessarily mean a violation of law has occurred. For the purpose of this definition, any notification received from a regulatory agency such as a notice to comply (NOC), notice of violation (NOV), etc., shall constitute an Environmental Incident.
- **Environmental Director** – is the person assigned the primary responsibility for environmental issues at Teledyne Microelectronic Technologies.

Key Terms and Definitions (cont.)

- **Environmental Observation(s)** – is an employee(s) observation of a situation, condition or event which he or she believes may not be in accordance with federal, state or local environmental laws or regulations, applicable procedures or corporate policy.
- **Exception** – is anything an Environmental Director determines may not be in accordance with federal, state, or local laws or regulations, or in accordance with corporate policy, company procedures in the environmental arena.
- **Facility** – A physical structure (or structures) supervised by one General Manager.
- **General Manager** – The senior executive or manager at Teledyne Microelectronic Technologies.
- **On-site Service Provider** – is any vendor, consultant, contractor or sub-contractor providing a service that affects Teledyne Microelectronic Technologies environmental compliance.
- **Senior Corporate Management** – The principle executive officers of Teledyne Technologies Incorporated, including its Chief Executive Officer, Chief Financial Officer, Controller and General Counsel.

1. Environmental Policy

As a unit of Teledyne Technologies Incorporated, Electronic and Communications Business Segment, Teledyne Microelectronic Technologies has adopted the Teledyne Corporate Environmental Policy Statement (**Appendix A**).

Implementation of the Environmental Policy Statement at Teledyne Microelectronic Technologies shall be through written policies, programs, and procedures such as:

- EHSP&P: ENVMG96, dated February 15, 1996 – Revised May 28, 2003 (Environmental Management Program)
- EHSP&P: 1050.7.3 MDR, dated May 5, 2001 (Environmental Management Procedure, Management of Change, Hazardous Material Management Guidelines)
- EHSP&P: 1050.7.4 MDR, dated September 5, 2000 (Environmental Management Procedure, Management of Change, Process Assessment and Evaluation)
- EHSP&P: H&S-03/03, dated March 25, 2003 (Environmental Rules and Work Practices for Contractors, Sub-Contractors and Vendors)
- EHSP&P: EHS-0603, dated June 2, 2002 (Environmental Compliance Facility Inspection Program)
- Annual Environmental Training for all employees, with an emphasis on Pollution Prevention Techniques to include but not be limited to:
 - Chemical Elimination
 - On-time Purchasing of Chemicals
 - Chemical Alternatives, such as aqueous vs. solvents

Communication of the Environmental Policy Statement at Teledyne Microelectronic Technologies shall be communicated through Senior Management Support, Employee Handouts, Training of Employees, Bulletin Board Postings, Teledyne Microelectronic Technologies web-site (www.teledynemicro.com) and shall place emphasis on all employees commitment to pursue and support the policy. Additionally, Teledyne Microelectronic Technologies Environmental Management System (EMS) is located on TDYTEDMDR7\COMMON\$ drive and can be accessed and reviewed internally through opening Folder: TDY Environment Management System, **File Name: tdv_ems.doc.**

2. **Organization, Personnel, and Oversight of EMS**

EHSP&P: EHS111903, dated November 19, 2003 (Environment, Health and Safety Organization, Responsibility and Authority) (**Appendix B**). This policy defines environmental compliance responsibility for the Teledyne Microelectronic Technologies Environmental Management Team and Environmental Director. The aforementioned policy identifies the Teledyne Microelectronic Technologies environmental management group and the relationship and environmental compliance responsibilities of the overall management structure.

- Teledyne Microelectronic Technologies Senior Management Organization Chart, and the Teledyne Microelectronic Technologies Operations Organization Chart (**Appendix B**);
- Teledyne Microelectronic Technologies Environmental, Health and Safety Organization Chart (**Appendix B**).

3. **Accountability and Responsibility**

The Manager of Environment, Health and Safety assigned at Teledyne Microelectronic Technologies has the responsibility to ensure environmental compliance is maintained and is accountable for the all aspects of the Facility EMS with the support of Senior Management (Sr. Vice President and General Manager). Additionally, all managers, supervisors, team leaders and employees have the responsibility to support the EMS and shall be held accountable for their actions. All issues of environmental noncompliance shall be addressed through Teledyne Electronics and Communications Human Resources Policies and Procedures, such as:

- Teledyne Electronics and Communications Policy and Procedure – 2003.1, (Employee Conduct and Discipline, dated October 30, 1998) Section 5, subchapter 5.3 (**Appendix C**)
- Teledyne Electronics and Communications Policy and Procedure – 2003.7, (Ethics- Code of Business Conduct, dated November 15, 2001) Section 4, subchapter 4.1, 4.2, Section 5, subchapter 5.1, Section 6 and Section 8, subchapter 8.4 (**Appendix C**)

On-site Service Providers, Contractors, and Sub-Contractors shall be accountable for all actions while working on Teledyne Microelectronic Technologies owned or leased property. While On-site Service Providers, Contractors and Sub-Contractors provide and control labor, methods, material, equipment, structures, and relevant skills to perform work, Teledyne Microelectronic Technologies, as the owner or lease holder requires **“all”** work to be done in compliance with all federal, state and local environmental regulations. Therefore, the attached EH&S procedure(s) establishes environmental policies as well, as specific safe work practices, that all Teledyne Microelectronic Technologies On-Site Service Providers, Contractors, and Sub-Contractors are obligated to follow.

- EHSP&P: H&S0303, dated March 25, 2003 (Teledyne Microelectronic Technologies Contractor, Sub-Contractor, Vendor – Environmental, Health and Safety Rules, Work Practices and General Information) (**Appendix D**)
- Teledyne Microelectronic Technologies Environmental Service Provider Checklist (**Appendix D**)

Teledyne Microelectronic Technologies uses the employees annual performance evaluation as the tool for documentation of compliance under Appraisal Factors, line item 8, “Ethics and Integrity”, which states:

- “Personally responsible for complying with the ethical standards and requirements established by Teledyne’s Ethics Code of business conduct”. Teledyne Electronics and Communications Policy and Procedure – 2003.7, (Ethics- Code of Business Conduct, dated November 15, 2001) Section 4, subchapter 4.1, 4.2, Section 5, subchapter 5.1, Section 6 and Section 8, subchapter 8.4.

It should be noted, that all employees shall be subject to disciplinary action up to and including termination of employment in the event they violate environmental regulations and procedures. Refer to Teledyne Electronics and Communications Policy and Procedure – 2003.1, (Employee Conduct and Discipline, dated October 30, 1998) Section 5, subchapter 5.3

4. **Environmental Requirements and Assessment, Prevention and Control**

This section of Teledyne Microelectronic Technologies Environmental Management System (EMS) provides information on steps taken by the facility to conduct the following to ensure environmental regulatory compliance, such as Process Assessment, Permit Compliance, Employee Training, etc.:

- Develop and maintain Teledyne Microelectronic Technologies Hazardous and Solid Waste Inventory to include the following (**Appendix E**):
 - Aqueous waste-streams
 - Air emission waste-streams
 - Solid/hazardous waste-streams (RCRA vs. Non-RCRA)
 - Non-hazardous waste-streams (Trash)

NOTE: Complete hazardous waste manifests and profiles are located within the Environmental Department located in Bldg #8.

- Process Assessment to ensure regulatory compliance (Management of Change), Hazardous Materials Management Guidelines (EHSP&P: 1050.7.3 MDR) (**Appendix F**)
- Process Assessment to ensure regulatory compliance (Management of Change), Environmental Management and Job Hazard Analysis or Process Assessment (EHSP&P: 1050.7.4 MDR) (**Appendix F**)
- Environmental Regulatory Assessment and Applicability, Dakota Software file located on Teledyne Microelectronic Technologies user home H-drive. To access, use the following: (**H:\word\newdakotaupdate\dakota2003.aud**). This file is read only and shall not be changed without prior authorization from the Environmental Director. To open this file, you must load the software onto your computer. Software is supported by Teledyne Microelectronic Technologies Information Technologies (IT) Department;
- Procedures that reflect responsibility and accountability for Environmental Compliance by Teledyne Microelectronic Technologies employee's, Contractors, Sub-Contractors and On-Site Providers are as follows:
 - EHSP&P: EHS111903, dated November 19, 2002 (Environment, Health and Safety Organization, Responsibility and Authority) (**Appendix B**)
 - EHSP&P: H&S0303, dated March 25, 2003 (Teledyne Microelectronic Technologies Contractor, Sub-Contractor, Vendor – Environmental, Health and Safety Rules, Work Practices and General Information) (**Appendix D**)
 - EHSP&P: ENVMG96, dated February 15, 1996, Revised May 28, 2003 (Environmental Management Program) (**Appendix G**)

Environmental Requirements and Assessment, Prevention and Control (cont)

- Teledyne Microelectronic Technologies EHS Program Calendar (**Appendix H**), which includes topics such as:
 - EHS Emergency Contact Information;
 - Employee training requirements;
 - Facility environmental permits and expiration dates;
 - Environmental Reports
 - Environmental Programs, Plans and Procedures, to include frequency of submission or update, due dates or review dates, submittal agency, responsible employee and location of documents.

5. ***Environmental Incident and Noncompliance Investigation***

The purpose of this section describes Teledyne Microelectronic Technologies internal and external Environmental Incident reporting procedure used at the facility.

- Legal Privilege – Where applicable, reporting of Environmental Incidents shall be conducted in accordance with Teledyne Electronic Technologies Attorney – Client Privilege and Attorney Work Product Doctrine.
- Environmental Incidents and Noncompliance Investigations shall be reported as follows:
 - Teledyne Microelectronic Technologies Environmental Incident Reporting Form and Regulatory Inspection Requirements (Surprise or Scheduled) (**Appendix I**)
 - Teledyne Microelectronic Technologies Compliance Matter Tracking Form (**Appendix J**)

Teledyne Microelectronic Technologies employees must report all Environmental Incidents, or Environmental issues of noncompliance they observe to Teledyne Microelectronic Technologies Environmental Director, or senior management at the Facility. Initial contact must be made orally. This is to avoid the risk that critical situations are not addressed due to unanswered e-mail or voice-mail messages, or due to submitted hardcopy reports being overlooked.

Environmental Observations may be reported to the Teledyne Microelectronic Technologies Environmental Director or senior management, however, corporate reporting is not required. Environmental Observations are defined in the Key Terms and Definition section of EMS, located on page 2.

In situations where there is no present or incipient risk to employee, public, or environmental welfare (such as when the concern relates to the performance of a specific employee, to aspects of general Facility Operating Segment or Corporate policy, or the like), the report may be submitted anonymously. This should be done only in rare cases, as it inhibits the ability to thoroughly investigate allegations, and to "close the loop" with employees who voice concerns. Likewise, an employee request to handle a report or discussion anonymously after the report is made, or the discussion occurs, will be considered, but legal necessities may preclude honoring such requests.

After reporting the Environmental Incident, Noncompliance Issue, the observer may be requested to complete the Environmental Incident Report (**Appendix I**) or this form may be completed by the Teledyne Microelectronic Technologies Environmental Director. In either case, it will be the responsibility of the Teledyne Microelectronic Technologies Environmental Director to ensure that the form has been properly completed.

Environmental Incident and Noncompliance Investigation (cont.)

All Environmental Incidents must be reported to senior Operating Segment management and the Corporate Legal Department. It is the responsibility of environmental management to make this report. It will be the responsibility of Teledyne Microelectronic Technologies environmental management working with the Corporate Legal Department, to determine if regulatory entities must be contacted. In all cases, Teledyne Microelectronic Technologies Environmental Director or a member of senior management will maintain an Environmental Incident log.

The decision to report immediately an issue to a regulatory entity, before consultation with senior management and the Corporate Legal Department, is at the discretion of Teledyne Microelectronic Technologies Environmental Director, if the event is of sufficient severity to require immediate regulatory agency notification. In all cases, however, Teledyne Microelectronic Technologies Environmental Director or designee will maintain an Environmental Incident log.

Department supervisors, or others directly responsible for operations where spills or releases may require agency notification will be trained in recognizing these types of events, and are directed to contact either Facility or Operating Segment management or the Corporate Legal Department in the case that Teledyne Microelectronic Technologies environmental management is unreachable. Unless directed otherwise by Corporate Legal Department, the incident should be addressed by Teledyne Microelectronic Technologies Environmental Director and/or senior management as follows:

1. Investigate the incident.
2. Determine root causes.
3. Assess the potential severity.
4. Working with the appropriate line and support personnel to develop the needed preventive or corrective actions.
5. Document decisions, actions, and accomplishments on the Environmental Incident Report form.

After appropriate corrective actions have been determined, the Facility and/or Operating Segment Environmental Director must report the disposition of the matter to the employee who originally reported the incident. This report must, at a minimum, be in writing. Scope of the response to the employee may be restricted by the Corporate Legal Department in certain cases

Teledyne Microelectronic Technologies Environmental Director or a specially designated member of senior management will also be responsible for the completion and retention of all incident reporting documentation, and will be accountable for any follow-up to ensure that corrective actions are in place and operating. This follow-up must occur as soon as possible after the completion of the corrective actions and must be documented. Teledyne Microelectronic Technologies Environmental Director or a specially designated member of senior management team will also be responsible for reporting any defects in the implementation of the corrective actions to appropriate Facility and/or Operating Segment management until all items are properly resolved.

6. *Environmental Training, Awareness and Competency*

The purpose of this section describes Teledyne Microelectronic Technologies environmental compliance training that provides education for all employees. This training is detailed in such a manner, when completed allows each employee to properly execute the environmental responsibilities of their job positions and/or assignments. Training for new hires is conducted within the first week of employment, typically the first day of employment at Teledyne Microelectronic Technologies, and additional training is annually thereafter. All environmental compliance training shall be documented and placed in each employee's personal file, which is located within the Human Resources Department. See EHS training calendar and EHS training matrix (**Appendix H**) for training specific requirements such as:

- Type of environmental compliance training
- Amount of environmental compliance training
- Current status of environmental compliance training

Training and documentation for non-production personal shall be generic in nature as referenced above, however, training for those employees who handle toxic chemicals/hazardous materials and hazardous waste shall be topic specific such as:

- Hazardous Waste Worker Training (29 CFR 1910.120)
- Department of Transportation (DOT) (49 CFR Subpart H)
- Hazard Communication (29 CFR 1910.1200)

All employees who have primary responsibility to maintain environmental compliance at Teledyne Microelectronic Technologies must attend mandatory third party training. This requirement is mandated to ensure competency with environmental requirements are met through the level of training professional organizations provide. Additionally, throughout the year, employees will be required to attend in-house training, which includes competency testing upon completion of training.

7. ***Environmental Planning and Organization Decision-Making***

This section of Teledyne Microelectronic Technologies Environmental Management System (EMS) works in conjunction with Section 4 of the EMS (Section 4 – Environmental Requirements and Assessment, Prevention and Control). Several programs are in place such as:

- EHSP&P:P 1050.7.4 MDR, (Environmental Management and Job Hazard Analysis or Process Assessment) (**Appendix F**) and
- EHS P&P: 1050.7.3 MDR (Hazardous Materials Management Guidelines) (**Appendix F**)

These programs along with Capital Request review and signature authority ensure that Teledyne Microelectronic Technologies Environmental Director is integrated into the organizational aspects of decision making for all capital improvements. Additionally, Engineering Change Orders (ECO's) such as: engineering programs, plans and process improvements that could impact environmental regulatory requirements must be approved by Teledyne Microelectronic Technologies Environmental Director and then released through Teledyne Microelectronic Technologies Data Control Electronic Ingenuus System.

In the event Teledyne Microelectronic Technologies is not in compliance with an applicable environmental requirement, Teledyne Microelectronic Technologies Environmental Director shall ensure the compliance matter is identified, tracked, and all corrective actions taken are documented using Teledyne Microelectronic Technologies Compliance Matter Tracking Form attached.

8. **Maintenance of Records and Documentation**

This section of Teledyne Microelectronic Technologies Environmental Management System (EMS) provides guidance for retaining and storing of environmental records and documentation. The records retention program applies to all environmental documents, with no exceptions. Although, regulatory statutes have specific retention requirements, Teledyne Electronic Technologies Corporate Records Management Program Policy mandates the following:

- **PERMANENT: (Files Located in Environmental Department Storage Office)**
 - Sampling/monitoring related to leaks/spills/discharge to environment; toxicology, efficacy, and other scientific studies, including back-up information; underground storage tank monitoring and operating records (non-hazardous waste);
 - Consulting contracts and consultant reports (except environmental contamination investigation/remedial actions); correspondence with government agencies; government regulations/ordinances; permits, storage and disposal of hazardous waste (DTSC Uniformed Hazardous Waste Manifests); permit applications and supporting documentation; reports to governmental agencies; superfund site cleanup records pursuant to EPA consent decrees or orders;
 - Annual reports regarding chemical wastes, landfill records including PCB items; disposal records to include bills of lading for disposal shipments and receipt of spent material; contracts for disposal, including reclamation agreements; inspection reports; reports to government authorities, hazardous waste surveys forms and hazardous waste determinations (active and inactive).
- **YEAR OF CREATION + 5: (Files Located in Environmental Directors Office and Environmental Department Storage Office)**
 - Reports of chemical manufacture required under Toxic Substances Control Act (TSCA), including documents for significant new use notice for Teledyne, including records for chemicals regulated under TSCA significant new use program;
 - Emission inventory reports and documentation, including routing air emission sampling/monitoring; lab analysis reports for incoming materials, for outgoing materials, and for samples; routine analyses for leaks and spills; routine water discharge sampling/monitoring;
 - Spill Prevention Control and Countermeasure Plans, including test procedures and records (N/A-to Teledyne Microelectronic Technologies)

Maintenance of Records and Documentation (cont.)

- **YEAR OF CREATION + 3: (Located in Environmental Directors Office)**
 - Reports and memoranda concerning environmental inspections/audits; Superfund Amendments and Reauthorization Act (SARA) title release inventory reports and notifications, including supporting documentation;
- **YEAR OF CREATION + 2: (Located in Environmental Directors Office)**
 - Asbestos Container Materials (ACM), inspection, monitoring, and disposal records to include abatement projects (floor tiles, etc.).
- **ACTIVE + 5: Located in Environmental Directors Office and Environmental Department Storage Office)**
 - Operations and maintenance records for air and water pollution control devices and/or equipment;
 - Contingency and emergency procedure manuals;
 - Spill prevention and control and countermeasure plans, including test procedures and records;
- **ACTIVE + 3:**
 - Facility Closure and Post-Closure Plans and Cost Estimates.

9. Pollution Prevention Program

This section of Teledyne Microelectronic Technologies Environmental Management System (EMS) describes what and how Teledyne Microelectronic Technologies does to prevent, reduce, recycle, reuse, and minimize hazardous wastes, to include water, air and solid hazardous waste(s).

- To comply with the aforementioned element of the EMS. Teledyne Microelectronic Technologies has developed comprehensive Pollution Prevention Program (PPP) to comply with State of California Senate Bill – 14 (Source Reeducation and Hazardous Waste Management Review Act of 1989). These reports are located within the Environmental Directors Office and consist of the following:
 - 2002/2003 Hazardous Waste Management Performance Report, Hazardous Waste Management Plan and Summary Progress Report
 - 1999/2000 Hazardous Waste Management Performance Report, Hazardous Waste Management Plan and Summary Progress Report
 - 1994/1995 Hazardous Waste Management Performance Report, Hazardous Waste Management Plan and Summary Progress Report

The goal of Teledyne Microelectronic Technologies Pollution Prevention Program is to:

- Reduce the generation of hazardous waste at the site;
- Reduce the release into the environment of chemicals that have adverse and serious health or environment effects;
- Document hazardous waste management information and make this information available to employees and the public.

10. Continuing Program Evaluation and Improvement

This section of Teledyne Microelectronic Technologies Environmental Management System (EMS) describes how Teledyne Microelectronic Technologies will evaluate the EMS.

This evaluation shall look for program improvement opportunities. These program improvement opportunities shall be completed through audits, reviews, and action plans if required. These audits shall be completed quarterly to ensure compliance with EMS and shall be conducted pursuant to EHSP&P 1203: Environmental Compliance Self Audit (**Appendix K**).

Certification of Compliance shall be signed by the Vice President and General Manager, and by the Director of Environment, Health and Safety within thirty (30) days of the end of each calendar year and shall be submitted to Senior Corporate Management (**Appendix L**).